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June 21, 2012

VIA ECF ONLY  
Hon. Elizabeth S. Stong  
United States Bankruptcy Judge  
United States Bankruptcy Court  
271 Cadman Plaza East  
Brooklyn, New York 11201

Re: In re Khan, Chapter 7, Case No. 10-46901-ess  
Kramer v. Mahia, Adv. Pro. No. 11-1520-ess

Dear Judge Stong:

I write in response to the request for the adjournment filed by Mr. Greenwald on behalf of Mr. Dahiya. As I advised Mr. Greenwald in an email, I do not understand how he could have reviewed this Court's Order and come to the conclusion that the Court had agreed that Mr. Dahiya had obtained a six (6) month adjournment if he retained counsel. The Order is quite explicit. If Mr. Greenwald wanted to modify that order, he had to make a motion to do so.

I find the fact that Mr. Dahiya would misrepresent the status of this case to Mr. Greenwald in such dramatic fashion quite disturbing. I note that none of the other things that were supposed to happen as a result of the extensive oral argument before the Court have occurred. Neither the undersigned nor the Court have been provided with evidence that Mr. Dahiya has ceased taking new clients, nor has he reported himself to the Attorney Assistance Program of the New York State Bar Association.

While I would normally agree to a reasonable adjournment, Mr. Greenwald has made it clear that he cannot adequately address this matter until at least October. That is unacceptable. This Firm is in the final stages of settling the underlying fraudulent conveyance action. Once that is done,

the funds will come into the Estate, and the creditors have a right to be paid. This matter cannot be allowed to linger, which would then require the case to remain open and put off a final distribution to creditors. This matter needs to be resolved in a timely manner. The fact that Mr. Dahiya waited until the last possible moment to have Mr. Greenwald appear for him is indicative of a continuing course of delay to permit Mr. Dahiya to conduct business as usual. As a result, this Firm opposes the request for the adjournment,

I remain available to the Court should there be any questions relating to this matter.

Thank you.

Very truly yours,

S/Avrum J. Rosen  
Avrum J. Rosen

cc: Wayne M. Greenwald Esq via email

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